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Reply to
Nashville Office

March 29, 2005

Chairman Pat Miller
Attn: Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

VIA HAND DELIVERY

RE IRM Utility, Inc. Petition to amend Certificate of Convenience and Necessity
Docket No. 04-00434

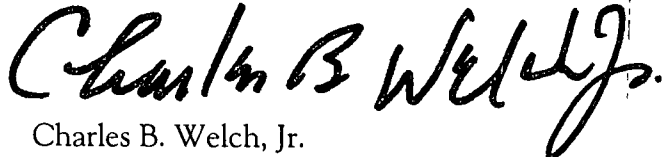
Dear Chairman Miller:

Please find enclosed an original and 14 copies of IRM Utility, Inc. Responses to the Staff Data Request. Please date and stamp a copy for our records.

Thank you for your assistance regarding this matter. If you have any questions, or if I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC


Charles B. Welch, Jr.

CBW/jmj

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**IRM UTILITY, INC. PETITION TO AMEND
CERTIFICATE OF CONVENIENCE AND
NECESSITY**

)
)
) **Docket No. 04-00434**
)

IRM UTILITY, INC. RESPONSE TO STAFF DATA REQUEST

- 1. Does your company maintain an escrow account to appropriate funds dedicated to system repairs or operations in the event of an emergency?**

No, not a trust or escrow account, however, there is a separate account set aside for repair and operations.

Does the company maintain an escrow account for any purpose?

Not at this time, but it will when there is utility income collected that is required by tariff to be placed in escrow.

If so, when was this account(s) first established? *N/A*

- 2. If your company does not have an escrow account, please explain how the company would fund extensive system repairs or operations in the event of an emergency.**

At this time IRM has three customers paying utility fees. These fees are pursuant to special contracts utilizing our commercial tariff. This tariff did not indicate escrow line items, therefore, there is no specific escrow account.

All utility income from rate based clients has been deposited in a special and separate checking account; IRM UTILITY SERVICES ACCOUNT at US Bank. At this time 100% of these monies have been identified for emergencies and/or repair

- a. Does the company have a copy of the legal document establishing this account?**

Yes, the account is a checking account.

- b. Is the account separately recorded on the company's financial statements?**

Yes

- c. What is the current balance in this account?**

\$ 5,926.⁴⁵

- d. For what purposes can funds from this account be used?**

Operations, repair and emergency.

- e. Has your company had occasion to use funds from this account over the last five (5) years?**

No

If yes, describe the event(s) that necessitated use of the funds.

N/A

- f. What internal procedures are in place for deposits and disbursements to this account?**

The Board of Directors of IRM has established a plan for these monies to be deposited in an individual account with any expense over \$1000.00 requiring approval of the Board.

- g. Who is (are) the person(s) responsible for carrying out these procedures?**

The secretary of IRM Utility, Inc., Marian J. Cox under the direction of the Board of Directors.

- h. Who is the person that is authorized to approve disbursements?**

As explained above in Section f., the Board of Directors.

- i. Does the company keep detailed records of deposits to and disbursements from this account?**

Yes

- j. How is this account funded?**

At this time a deposit match of 100% of all rate- based utility receipts are deposited in this account until The Board of directors of IRM Utility,

Inc. indicates otherwise. This is funded by the actual receipts and the investors/owners of IRM Utility, Inc.

- k. What is the account number and where on the company's annual report to the TRA is the account disclosed?

This account is not a specific account. It is a line item account for expenses and operations in an account established as a checking account set up for operations of IRM Utility, Inc.

3. If an escrow account(s) exists, please answer the following questions:

N/A

- a. Does the company have a copy of the legal document establishing this account?
- b. Is the account separately recorded on the company's financial statements?
- c. What is the current balance in this account?
- d. For what purposes can funds from this account be used?
- e. Has your company had occasion to use funds from this account over the last five (5) years? If yes, describe the event(s) that necessitated use of the funds.
- f. What internal procedures are in place for deposits and disbursements to this account?
- g. Who is (are) the person(s) responsible for carrying out these procedures?
- h. Who is the person that is authorized to approve disbursements?
- i. Does the company keep detailed records of deposits to and disbursements from this account?
- j. How is this account funded?
- k. What is the account number and where on the company's annual report to the TRA is the account disclosed?